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June 28, 2011

By: ECF Filing & Fax (973) 645-4412

Hon. Michael A. Shipp  
United States District Court  
District of New Jersey  
Martin Luther King Building  
50 Walnut Street, Room 4015  
Newark, New Jersey 07101

So Ordered this 1<sup>st</sup> day  
of July, 2011  
  
Michael A. Shipp  
United States Magistrate Judge

Re: *Sperry Associates Federal Credit Union*  
v.  
*CUMIS Insurance Society, Inc.*  
Civil Case No. 10-00029

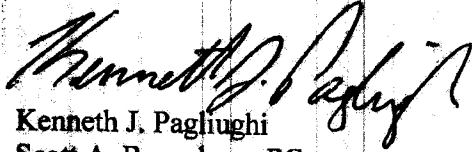
Dear Judge Shipp:

As Your Honor is aware, this office represents Plaintiff, Sperry Associates Federal Credit Union ("Sperry") in the above captioned matter. I am writing you regarding a non-party deposition that Sperry has attempted to schedule.

On June 22, 2011 Sperry served a subpoena to testify at deposition scheduled for July 1, 2011 on non-party Amy Owen, Esq. who had been retained by CUMIS to assist the credit unions in the investigation of their various claims against Fannie Mae. On June 23, 2011 CUMIS advised that Ms. Owen will not be available on July 1, 2011 but that she would be available on July 13, 2011 and that CUMIS would not object to Sperry's request to continue the discovery deadline solely for the purpose of conducting Ms. Owen's July 13<sup>th</sup> deposition.

As Ms. Owen will not be available until after the scheduled close of discovery on July 5, 2011, but prior to the status conference scheduled for July 14, 2011, Sperry respectfully requests that it be permitted to conduct the deposition of Ms. Owen on July 13, 2011.

Respectfully,



Kenneth J. Pagliughi  
Scott A. Rosenberg, PC

cc: Michael R. Davisson, Esq. (via ECF Notification)  
Arthur Aizley, Esq. (via ECF Notification)  
Valerie Rojas, Esq. (via ECF Notification)